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DELOIS L. SHELTON  
OFFICE OF REGULATORY AFFAIRS  
WEIDER NUTRITION INTERNATIONAL, INC.  
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RECEIVED  
11/22/98

January 15, 1998

James Tanner, PhD  
Acting Director, Division of Programs and Enforcement Policy  
Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street SW  
Washington DC 20204

Re: *Submission of Structure/Function Claims*

Dear Dr Tanner:

Enclosed are the structure/function claims for the following product, as generated by Dr. Luke Bucci:

- 1) Great American Nutrition™ NuStart™ Glucarate
  - a) Calcium D-Glucarate
  - b) Selenomax
  - c) Vitamin C

We welcome the opportunity to receive feedback from your office as we continue to interpret how to write structure/function claims as allowed by the Dietary Supplement Health and Education Act. There are some areas of overlap between nutrient functions or their effects on body structure and health claims. We anticipate that we will continue to fully comply with your interpretation of health claims.

Please feel free to contact me if you have further questions or comments.

Respectfully,



De Lois L. Shelton, Regulatory Compliance

cc: Dave Mastroianni, Luke R. Bucci

975-0162

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